



Partner Housing Australasia (Building) Incorporated  
 ABN 88 722 057 429 CFN: 15429  
 Web: [www.partnerhousing.org](http://www.partnerhousing.org)  
 Pro-bono professional services and funding for South Pacific  
 village infrastructure, housing, water, sanitation and training.



272 Blackwall Road, Woy Woy NSW 2256, Australia  
 Phone: +61 432 611 550  
 Email: [partner.housingaus@gmail.com](mailto:partner.housingaus@gmail.com)

Partner Housing is a signatory to the ACFID Code of Conduct, which is a voluntary, self-regulatory sector code of good practice. As a signatory we are committed and fully adhere to the ACFID Code of Conduct, conducting our work with transparency, accountability and integrity.

## Complaints Handling, Whistle Blowing and Incident Management Systems Policies and Procedures



**Declaration** – These policies and procedures have been approved by the Partner Housing Australasia (Building) Incorporated Annual General Meeting of 4 December 2023. They set out the means of complying with the “Constitution & Code of Conduct”, and the requirements of the Australian Department of Foreign Affairs and Trade (DFAT) and the Australian Council for International Development (ACFID).

**Signed**

Rod Johnston, President, Partner Housing Australasia (Building) Incorporated

**Adoption of Document Revisions**

Reference	Revision	Date of Adoption	Principal Amendments
P23040317	1	3 April 2023	Revision to align with Vision, Mission, Values & DFAT requirements
P24010117	1	1 January 2024	General review and update

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## Vision

Partner Housing Australasia is an entirely voluntary organisation, which aims to transform the lives of people living in Asia-Pacific villages by improving the cyclone, earthquake and tsunami resistance of their houses, clinics, schools, and community buildings; and by providing clean water supplies and hygienic sanitation.

## Commitment

Consistent with the vision, Partner Housing Australasia and its Partner Organisations are committed to a management process that facilitates the reporting and effective resolution of complaints, encourages and resolves retribution-free whistle-blowing, and activates the reporting, resolution, and review of incidents and improvement requests.

## Code of Conduct

Partner Housing Australasia is a signatory to the ACFID Code of Conduct, which is a voluntary, self-regulatory sector code of good practice. As a signatory, we are committed and fully adhere to the ACFID Code of Conduct, conducting our work with transparency, accountability and integrity. The following policies and procedures have been developed to reflect the vision, and to simultaneously ensure consistency with the ACFID Code of Conduct.

## Scope

These Policies and Procedures apply to Partner Housing Australasia, its Partner Organisations, Representatives, and any guests who might accompany these people to the locations where the programs are implemented. The "Policy" expands the organisation's vision, mission, and values; together with satisfying the DFAT and ACFID requirements, and the "Procedures" set out the means of implementing policy. An associated "Training" document provides additional material and background, and "Compliance and Audit Record" documents provide the relevant records of compliance and verification.

## Definitions

A comprehensive set of definitions is set out in "Constitution & Code of Conduct". Definitions specific to this policy are set out below.

Partner Organisations are those bodies working with Partner Housing Australasia to implement the programs. For purposes of this document, they include (but are not limited to) Vision for Homes [PNG] and South Ranongga Community Association [SRCA]).

Representatives is the term used to describe collectively the Board Directors, Managers, Volunteers, Staff (if so engaged), Contractors and Consultants who administer the programs and projects.

Volunteer means a person who carries out executive, management, administrative, operations, design, project management and/or similar functions (whether executed in Australia or overseas) on a pro bono basis, under the direction of the Chief Executive Officer (on behalf of the Board). A Volunteer may also be a Member or a Director. Partner Housing Australasia is an entirely voluntary organisation. Volunteer does not include "Contractors" or "Consultants", who provide goods or services on a pro bono or commercial basis, or people who provide minor assistance on a casual and infrequent basis.

Local authority figures include, but are not limited to, community elders, senior representatives of other local NGOs and senior civil society leaders of good repute.

Risk Analysis is a systematic use of available information to determine how often specified events may occur and the magnitude of their likely consequence. For purposes of this policy, Risk Analysis, and associated terms (including those listed herein) are as defined in ISO 31000 and AS/NZS 4360.

Complaint means an 'expression of dissatisfaction' as defined by International Standards Organisation standard on complaints handling. In simple terms, a "complaint" is the expression of dissatisfaction with the services or personnel of Partner Housing Australasia or its Partner Organisations, that is raised by any person.

Incident reporting is the process of documenting the facts and details of a failure of the management process, the service or the physical infrastructure provided. Incident reporting should provide clear information about the events leading to an incident, with a complete analysis of actions. In an ISO 9001 management system, incident reporting (including nonconformance reporting and improvement requests) is the first step to remedial action (the fixing of the problem) and corrective action (changes to management practices that prevent a recurrence of the problem.)

Whistle blower is a person who exposes any kind of information or activity that is deemed illegal, unethical, or not correct within an organization that is either private or public. The information of alleged wrongdoing can be classified in many ways: violation of company policy/rules, law, regulation, or threat to public interest/national security, as well as fraud, and corruption. Whistle blower protection in Australia is offered for certain disclosures under a patchwork of laws at both federal and state level. Eligibility for protection depends on the requirements of the applicable law and the subject matter of the disclosure. Not all disclosures are protected by law in Australia. At federal level, whistle blowers face potential imprisonment for making disclosures about certain subjects, including national security and immigration matters. Protection in New South Wales is currently offered by the Protected Disclosures Act 1994 (NSW).

## Policy

### *A2.4 Complaints handling, whistle blowing, and incident management systems*

Partner Housing Australasia has “public facing” complaints handling, whistle blowing, and incident management systems that are accessible via the website [www.PartnerHousing.org](http://www.PartnerHousing.org), email or phone to all stakeholders, including the general public, partners, beneficiaries, donors, members, and volunteers.

The complaints handling, whistle blowing and incident reporting policies, procedures and practices shall be promoted through the website, posts, MOUs, and training packages.

Partner Housing Australasia has a formal, public, and accessible complaints handling mechanism, whereby the public can register concerns or complaints by email accessed through [www.PartnerHousing.org/Governance](http://www.PartnerHousing.org/Governance). This sets out clear procedures providing guidance on how complaints are handled, including mechanisms that are accessible for partners and primary stakeholders/community members, consistent with local culture and irrespective of gender. People who do not have phone or internet access, or who do not speak English, may lodge a complaint to a local authority figure, who shall communicate it to the Partner Organisation, and thence to Partner Housing Australasia.

Partner Housing Australasia shall ensure that people making complaints, whistle blowing, or reporting incidents can do so, confident that their privacy will be respected, and that they will suffer no penalty or cost.

This policy applies to all Partner Housing Australasia Representatives and Partner Organisations. They shall be trained in its application. The Partner Organisation Managers are influential members within their communities, working with all stakeholders and community members, and they shall be aware of the policies and reporting procedures.

**Complaints Handling** – Partner Housing Australasia recognises the importance and value of listening and responding to concerns and complaints. Receiving concerns and complaints is one of the most important ways of learning what we need to do to improve our work. Partner Housing Australasia and its Partner Organisations shall act together to adhere to the Complaints Handling Policy. Partner Housing Australasia shall address all complaints in an equitable, fair, and unbiased manner using evidence submitted by both the complainant and our personnel through the complaint handling process.

**Whistle Blowing** – Partner Housing Australasia is committed to transparency in its operations and encourages its Members and Volunteers to speak openly and honestly of the Organisation’s activities. Partner Housing Australasia shall address all whistle blowing revelations in an equitable, fair, and unbiased manner using evidence submitted by both the whistle blower and our personnel through the process.

**Incident Reporting** – Partner Housing Australasia committed to basic quality assurance, consistent with those principles of ISO 9001 that are appropriate to a charitable NGO providing such services. The Key elements include Incident Reporting (and Improvement Requests), Remedial Action (to fix any problem), Corrective Action (to ensure the problem does not arise again), Management Review (Strategic Review), Management Auditing to determine the effectiveness of Corrective Action), and Training.

## **Responsible Personnel**

The person with overall responsibility for implementing this policy is the Chief Executive Officer (CEO).

All Partner Housing Australasia personnel have a responsibility to ensure that the individual policies and procedures are observed. Specific tasks are delegated in the position descriptions, and/or most likely to be involved in implementation are, Administration Manager, Regional Managers and Project Managers.

## **Procedures**

### **Review of these Policies and Procedures**

The policies and procedures set out in this “Policies and Procedures” document shall be reviewed at each Annual General Meeting, as part of the scheduled general policy review.

### **Risk Analysis**

The CEO shall implement the following:

- Prepare a Risk Analysis for the risk of failing to satisfactorily address all complaints, whistle blowing and incidents reported to the organisation.
- Assess and prioritize the risk associated with each program and its component projects, and determine the appropriate mitigation actions.
- Record the Risk Analyses in the Strategic Plans appropriate to each program.
- Summarize the Risk Analyses and the mitigations in a Risk Register.

### **Compliance and Auditing**

The Responsible Personnel shall implement the following:

- Initiate the required monitoring, evaluation and learning functions associated with this “Policies and Procedures” document.
- Initiate both internal and external auditing, consistent with ISO 9001 principles of the policies and procedures herein.
- Ensure that the compliance with the policies and procedures herein, and the associated internal and external audits, are recorded in the associated “Compliance and Audit Records” documents.

### **Training**

The Responsible Personnel shall implement the following:

- Distribute a reference and link to this “Policies and Procedures” document to all Directors, Regional Managers and Partner Organisation Managers, and other personnel working on behalf of the organisation. (Partner Housing Australasia is a voluntary organisation and does not employ staff).
- Distribute a reference and link to the associated “Training” package. Request that all Directors, Regional Managers and Partner Organisation Managers use this to increase their awareness and understanding of these policies and procedures.
- Include a reference and link to this “Policies and Procedures” document in all Memoranda of Understanding with Partner Organisations.
- Table this “Policies and Procedures” document at the Annual General Meeting, for discussion and adoption.
- Review the training effectiveness at the February Board Meeting.

## **Complaint Handling**

### Context

Continual improvement of the complaint handling process and the quality of services is one of our permanent objectives. To this end Partner Housing Australasia will:

- maintain data collection on complaints for the purpose of identifying trends in satisfaction or dissatisfaction with the organisation;
- purpose of enhancing information management and service provided;
- keep abreast of best practices (both locally and overseas) regarding complaint handling;
- foster a consumer/client-focused approach;
- undertake specific training and retraining of staff to foster better complaint handling practices;
- encourage innovation in complaint handling development; and
- recognise and reward exemplary complaint handling behaviour.

The Organisation will accept all complaints relating to Representatives and Partner Organisations, our contracted service providers, or anyone else acting on our behalf.

A complaint may be made by a person to whom we deliver services or goods or who is affected by our services or goods, a partner, a local organisation we work, volunteers, donors or a member of the public.

Anonymous complaints can be made, but obviously our ability to investigate them may be limited because of this.

### Procedures to ensure the complaint handling policies are understood

- A Memorandum of Understanding, including the relevant policy, shall be signed by each Partner Organisation.
- The Complaints Policy shall be distributed to all Directors and Regional Managers and reviewed in the context of this and other projects at each February Board Meeting.
- A report on any complaints in the context of the Partner Organisation shall be presented to the next Board Meeting and dealt with as per the Procedures.

### How the Organisation will handle complaints

When oral complaints are made, Partner Housing Australasia personnel shall:

- Identify ourselves, listen, record details, and determine what the client wants;
- Confirm that we have understood and received the details;
- Show empathy for the client, but not attempt to take sides, lay blame, or become defensive.

For all complaints Partner Housing Australasia personnel shall:

- Seek from the client the outcome/s they are expecting;
- Make an initial assessment of the severity of the complaint and the urgency of action
- Clearly explain to the client the course of action that will follow:
  - if the complaint is out of our jurisdiction;
  - if we may exercise a discretion not to investigate;
  - if preliminary enquiries need to be made, or further consideration needs to be given: or
  - if the complaint is to be investigated.

- The Organisation shall assure the client that the complaint will be fully investigated in line with this policy;
- Give an estimated timeframe or, if that is not possible, a date by which the Organisation will contact them again;
- Ensure that the complaint is appropriately acknowledged;
- Follow up where necessary, and monitor whether the client is satisfied.
- The Organisation will register all complaints (see section 16)

The Organisation shall provide capacity building to partners working in communities we serve have all necessary training to encourage and handle inquiries, expressions of concern and making of complaints so as to take account of cultural and gender sensitivities and to ensure that cases involving children are appropriately handled.

The Organisation will ensure that a complainant is not required to express their complaint to a person implicated in their complaint.

The Organisation shall also ensure that a person implicated in a complaint is not involved in any way with the handling of that complaint.

#### Initial Assessment of Complaint

The Organisation shall first assess whether there is more than one issue raised in the complaint and whether each needs to be separately addressed.

To determine how a complaint should be managed, the Organisation shall assess it in terms of the following criteria:

- a) severity;
- b) health (including mental health) and safety implications;
- c) financial implications for the complainant or others
- c) complexity;
- d) impact on the individual, public and organisation;
- e) potential to escalate; and
- f) the need for, and possibility of immediate action.

If the complaint is assessed as significant in terms of one or more of these criteria, it shall be classified accordingly.

#### Inquiries, Minor Complaints and Jurisdiction

The Organisation shall endeavour to deal immediately with inquiries and minor complaints which are made orally by telephone or in person i.e., during the initial phone call or meeting.

However, as far as possible, the Organisation shall ensure that the inquirer or complainant is completely satisfied with the information and or resolution provided.

On receipt of a complaint, the Organisation shall also attempt to determine expeditiously whether investigation is required or not depending on jurisdictional questions and whether the complaint is ill conceived.

If the complainant disputes an assessment that a complaint should not be investigated, the member of staff handling the complaint will refer it to a more senior colleague for review. If such a dispute is unresolvable the Organisation shall refer the complainant to Code Committee of the Australian Council for International Development (ACFID)



### How the Organisation will investigate complaints

The Organisation shall make every reasonable effort to investigate all the relevant circumstances and information surrounding a complaint. The level of investigation will be commensurate with the seriousness and frequency of the complaint.

### Timeframes

The Organisation shall acknowledge written complaints within 5 days.

The Organisation shall acknowledge oral complaints immediately.

The Organisation shall aim to resolve complaints as quickly as possible and within 30 days unless there are exceptional circumstances. If a complaint is not resolved within 30 days, we will inform the complainant of progress and keep them informed of progress every two weeks.

### How the Organisation will respond to and close a complaint

The President or a Board Member delegated by him/her will normally make the decision on a complaint that has required investigation (i.e., not a minor complaint). Decisions on serious complaints may be referred to the Board.

The Organisation shall communicate our decision on a complaint as soon as is practical. Our communication will be in writing in the appropriate language by email and/or post. However, where appropriate such as in the case of a complaint being made by a local community member (in the field) we will also communicate our decision orally and again in the appropriate language.

The Organisation shall encourage the complainant to respond and advise whether or not they are satisfied with our decision. In our decision we will advise that if a complainant is not satisfied, we will be prepared to consider any additional information they may provide and to review our decision.

In all cases, the Organisation shall advise that the complaint may be referred to the Code Committee of ACFID. We will provide all necessary information for referral to the Code Committee and offer to assist in referral.

### How the Organisation will learn from complaints

The Organisation shall ensure that all relevant personnel are informed of the outcomes of complaints and the implications for our services, goods, procedures, and processes.

The Organisation shall take all required remedial action. We will be prepared to change the way in which we operate and improve or undertake further training of our people. Where needed we will counsel or discipline our people.

Where appropriate the Organisation shall consult and take advice from ACFID and/or other relevant regulatory/enforcement authorities.

### Confidentiality

The Organisation shall not reveal a complainant's name or personal details to anyone in or outside our organisation other than the persons involved in handling the complaint without obtaining the complainant's permission. See also the Privacy Procedures

### Complaint Data

The Organisation shall register all complaints. The Organisation shall ensure that the following information is contained in written complaints and if not, and in the case of oral complaints, record this information ourselves:

- date of receipt
- a description of the complaint and relevant supporting data;
- the requested remedy;
- the service(s) and/or good(s) and/or practice or procedure complained about;
- the due date for a response;
- immediate action taken (if any) to resolve the complaint.

### Reporting About Complaints

The Organisation shall immediately escalate complex and/or major complaints to the President or his/her delegate.

All complaints shall be reported at the next Board Meeting.

Minor complaints shall be reported in summary form. Major complaints shall be reported in detail.

### Training

Members, Directors, Volunteers and Partner organisations shall be made aware of this policy and these procedures, by:

- Tabling and discussing them at the AGM;
- Including them with any brief provided to volunteers, contractors or other personnel working on behalf of the organisation. (Partner Housing Australasia is a voluntary organisation and does not employ staff);  
and
- Including them with any Memorandum of Understanding with Partner Organisations.

## **Whistle Blowing**

### Application

This Procedure applies to Directors, Members and Volunteers of Partner Housing Australasia, and to persons acting on behalf of the Organisation in Australia and overseas.

### Whistle Blowing Procedures

All Representatives of Partner Housing Australasia are encouraged to familiarise themselves with the policies and procedures of the Organisation, and with the details of each of any projects in which they are interested.

To assist this, the Chief Executive Officer shall ensure that the Regional Managers and Project Managers make available to any Member or Volunteer any requested project information. The only exception is information of a personal nature, which is covered by the Privacy Policy

The Chief Executive Officer shall record and report to the Board:

- any extraordinary requests for information that is not commonly sought and
- any public or private expression of concern that the Organisations policies or procedures are not being correctly observed.

### Training

Members, Directors, Volunteers and Partner organisations shall be made aware of this policy and these procedures, by:

- Tabling and discussing them at the AGM;
- Tabling and discussing them at the February Board Meeting (as part of the training package);
- Including them with any brief provided to volunteers, contractors or other personnel working on behalf of the organisation. (Partner Housing Australasia is a voluntary organisation and does not employ staff);
- Including them with any Memorandum of Understanding with Partner Organisations.

## Incident Reporting

### Context

Incident reporting is an essential part to the basic quality management system, consistent with those principles of ISO 9001 that are appropriate to a charitable NGO which provides funding, design, construction auditing, training, and mentoring in the remote villages of PNG, Solomon Islands, and other South Pacific countries.

### Procedure

The Responsible Personnel shall implement the following:

- (a) On detecting a nonconformance or identifying a need for improvement, complete an NCR (Nonconformance Report) and forward it by email to the CEO.
- (b) The CEO shall discuss the appropriate Remedial Action and Correction Action with the relevant Manager.
- (c) Initiate the Remedial Action.
- (d) Initiate the Corrective Action.
- (e) Report the incident and the actions taken to the next Board Meeting.

### Sample Incident Report and Improvement Request

Send	To...	
	Cc...	
	Bcc...	
Subject		FW: P20070101-1 NCR RCA Phone Bill
<b>Sent:</b>		
<b>To:</b>		
<b>Subject:</b> P2#####-1 NCR #####		
<b>Report</b> – <i>Suggestions, improvement requests, nonconformances, problems and/or complaints</i>		
The following report results from #####. Reported by ###.		
<b>Remedial Action</b> – <i>Short term action to remedy problems, complaints, improvements or suggestions.</i>		
### - Action: ###		
<b>Corrective Action</b> – <i>Long term action to ensure that problems and complaints do not reoccur and/or improvements and suggestions (if agreed) are implemented.</i>		
### - Action: ###		

## **Disciplining Members**

The following procedures are reproduced from the “Constitution & Code of Conduct”, based on the NSW Office of Fair-Trading Model Rules. They apply when the Board deems that discipline of a Member is warranted.

### ***Disciplining of members***

- (a) *A complaint may be made to the Board by any person that a member of the Organisation:*
- i. has refused or neglected to comply with a provision or provisions of this constitution, or*
  - ii. has wilfully acted in a manner prejudicial to the interests of the Organisation.*
- (b) *The Board may refuse to deal with a complaint if it considers the complaint to be trivial or vexatious in nature.*
- (c) *If the Board decides to deal with the complaint, the Board:*
- i. must cause notice of the complaint to be served on the member concerned, and*
  - ii. must give the member at least 14 days from the time the notice is served within which to make submissions to the Board in connection with the complaint, and*
  - iii. must take into consideration any submissions made by the member in connection with the complaint.*
- (d) *The Board may, by resolution, expel the member from the Organisation or suspend the member from membership of the Organisation if, after considering the complaint and any submissions made in connection with the complaint, it is satisfied that the facts alleged in the complaint have been proved and the expulsion or suspension is warranted in the circumstances.*
- (e) *If the Board expels or suspends a member, the secretary must, within 7 days after the action is taken, cause written notice to be given to the member of the action taken, of the reasons given by the Board for having taken that action and of the member’s right of appeal under clause 12.*

*The expulsion or suspension does not take effect:*

*until the expiration of the period within which the member is entitled to appeal against the resolution concerned, or*

*if within that period the member exercises the right of appeal, unless and until the Organisation confirms the resolution under clause 12, whichever is the later.*

### ***Right of appeal of disciplined member***

*A member may appeal to the Organisation in general meeting against a resolution of the Board under clause 11, within 7 days after notice of the resolution is served on the member, by lodging with the secretary a notice to that effect.*

- (a) *The notice may, but need not, be accompanied by a statement of the grounds on which the member intends to rely for the purposes of the appeal.*
- (b) *On receipt of a notice from a member under subclause (a), the secretary must notify the Board, which is to convene a general meeting of the Organisation to be held within 28 days after the date on which the secretary received the notice.*
- (c) *At a general meeting of the Organisation convened under subclause (c):*
- i. no business other than the question of the appeal is to be transacted, and*
  - ii. the Board and the member must be given the opportunity to state their respective cases orally or in writing, or both, and*

*the members present are to vote by secret ballot on the question of whether the resolution should be confirmed or revoked.*

*The appeal is to be determined by a simple majority of votes cast by members of the Organisation.*